

1 LERACH COUGHLIN STOIA GELLER  
2 RUDMAN & ROBBINS LLP  
3 WILLIAM S. LERACH (68581)  
SPENCER A. BURKHOLZ (147029)  
3 DANIEL S. DROSMAN (200643)  
JONAH H. GOLDSTEIN (193777)  
4 MATTHEW P. MONTGOMERY (180196)  
LUCAS F. OLTS (234843)  
5 401 B Street, Suite 1600  
San Diego, CA 92101  
6 Telephone: 619/231-1058  
619/231-7423 (fax)  
7 – and –  
PATRICK J. COUGHLIN (111070)  
8 LESLEY E. WEAVER (191305)  
100 Pine Street, Suite 2600  
9 San Francisco, CA 94111  
Telephone: 415/288-4545  
10 415/288-4534 (fax)

11 LEVIN, PAPANTONIO, THOMAS, MITCHELL,  
ECHSNER & PROCTOR, P.A.  
12 FREDRIC G. LEVIN (*pro hac vice*)  
J. MICHAEL PAPANTONIO (*pro hac vice*)  
13 TIMOTHY M. O'BRIEN (*pro hac vice*)  
316 South Baylen Street, Suite 600  
14 Pensacola, FL 32501  
Telephone: 850/435-7000  
15 850/436-6084 (fax)

16 Co-Lead Counsel for Plaintiffs

17 [Additional counsel appear on signature page.]

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 SAN JOSE DIVISION

21 In re CISCO SYSTEMS, INC. SECURITIES ) Master File No. C-01-20418-JW(PVT)  
LITIGATION )  
22 \_\_\_\_\_ ) CLASS ACTION  
23 This Document Relates To: ) STIPULATION AND [PROPOSED] ORDER  
24 ALL ACTIONS. ) REGARDING PRETRIAL SCHEDULE  
25 \_\_\_\_\_  
26  
27  
28

1           WHEREAS, the July 2, 2003 Amended Scheduling Order provides for a pretrial schedule as  
2 follows:

3	Plaintiffs' Expert Reports Due	July 29, 2005
4	Defendants' Expert Reports Due	July 29, 2005
5	Plaintiffs' Rebuttal Reports Due	August 8, 2005
6	Defendants' Rebuttal Reports Due	August 8, 2005
7	Objections to Experts Due	September 12, 2005
8	Fact Discovery Cut-Off	September 30, 2005
9	Expert Discovery Cut-Off	September 30, 2005
10	Pretrial Motions Due	January 24, 2006
11	Pretrial Motion Hearing	February 27, 2006
12	Pretrial Conference	April 24, 2006
13	Joint Pretrial Statement Due	May 12, 2006
14	Motions in <i>Limine</i> Due	June 2, 2006
15	Final Pretrial Conference	June 12, 2006
16	Trial	June 27, 2006

17           WHEREAS, the parties have engaged in substantial fact discovery to date, including written  
18 discovery, document production and depositions;

19           WHEREAS, the parties anticipate completing all fact discovery by September 30, 2005;

20           WHEREAS, the parties believe it would be more efficient to conduct expert discovery after  
21 fact discovery is concluded;

22           WHEREAS, the parties have been unable to agree on the proper sequencing of the disclosure  
23 of experts and expert reports. The parties intend to submit to the Court alternative proposed orders  
24 on this issue accompanied by a brief supporting memorandum from each party;

25           THEREFORE, the parties, through their counsel of record, hereby stipulate to the following  
26 pretrial schedule which does not alter the existing fact discovery cut-off:

1                   Fact Discovery Cut-Off                   September 30, 2005  
2                   Plaintiffs' Expert Reports Due       TBD  
3                   Defendants' Expert Reports Due      TBD  
4                   Rebuttal Reports Due                  TBD  
5                   Expert Discovery Cut-Off             February 24, 2006  
6                   Dispositive Motions Filed           March 6, 2006  
7                   Oppositions to Dispositive Motions Filed     April 24, 2006  
8                   Replies to Dispositive Motions Filed   May 22, 2006  
9                   Hearing on Dispositive Motions       June 9, 2006  
10                  Objection to Experts Due            June 30, 2006  
11                  Pretrial Conference                  July 14, 2006  
12                  Joint Pretrial Statement Due        August 14, 2006  
13                  Motions in *Limine* Due               September 8, 2006  
14                  Final Pretrial Conference           September 18, 2006  
15                  Trial                                  September 29, 2006

16                  IT IS SO STIPULATED.

17                  DATED: April 4, 2005

18                  LERACH COUGHLIN STOIA GELLER  
19                  RUDMAN & ROBBINS LLP  
20                  WILLIAM S. LERACH  
21                  SPENCER A. BURKHOLZ  
22                  DANIEL S. DROSMAN  
23                  JONAH H. GOLDSTEIN  
24                  MATTHEW P. MONTGOMERY  
25                  LUCAS F. OLTS

26                  \_\_\_\_\_  
27                  /s/ Daniel S. Drosman  
28                  DANIEL S. DROSMAN

29                  401 B Street, Suite 1600  
30                  San Diego, CA 92101  
31                  Telephone: 619/231-1058  
32                  619/231-7423 (fax)

33                  Co-Lead Counsel for Plaintiffs

1 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General Order  
45, X.B., I hereby attest that Carol Lynn Thompson has concurred in this filing.

3 DATED: April 4, 2005

HELLER EHRLMAN WHITE & MCAULIFFE LLP  
CAROL LYNN THOMPSON

5 \_\_\_\_\_  
6 /s/ Carol Lynn Thompson  
CAROL LYNN THOMPSON

7 333 Bush Street  
8 San Francisco, CA 94104-2878  
Telephone: 415/772-6000  
415/772-6268 (Fax)

9 Counsel for PricewaterhouseCoopers LLP

10 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file  
11 this Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General  
Order 45, X.B., I hereby attest that Robert Y. Sperling has concurred in this filing.

12 DATED: April 4, 2005

WINSTON & STRAWN LLP  
ROBERT Y. SPERLING

15 \_\_\_\_\_  
16 /s/ Robert Y. Sperling  
ROBERT Y. SPERLING

17 35 West Wacker Drive, Suite 4200  
Chicago, IL 60601-9703  
Telephone: 312/558-5600  
312/558-5700 (Fax)

19 Counsel for the Cisco Defendants

20 \* \* \*

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: \_\_\_\_\_

24 THE HONORABLE JAMES WARE  
UNITED STATES DISTRICT JUDGE

## DECLARATION OF SERVICE

I hereby certify that on April 4, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys denoted on the attached Service List. I hereby certify that I have caused this document to be mailed by the United States Postal Service and/or faxed to the non-CM/ECF participants listed on the attached Service List.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  
4th day of April, 2005, at San Diego, California.

s/Daniel S. Drosman  
DANIEL S. DROSMAN

CISCO (FEDERAL-LEAD)

Service List - 4/4/2005 (201-110-1)

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**Counsel For Defendant(s)**

Dean S. Kristy  
Kevin P. Muck  
Felix Lee  
Fenwick & West LLP  
275 Battery Street, Suite 1500  
San Francisco, CA 94111  
415/875-2300  
415/281-1350(Fax)

Norman J. Blears  
Daniel T. Rockey  
Heller Ehrman White & McAuliffe LLP  
275 Middlefield Road  
Menlo Park, CA 94025  
650/324-7000  
650/324-0638(Fax)

Carol Lynn Thompson  
Heller Ehrman White & McAuliffe LLP  
333 Bush Street, Suite 3100  
San Francisco, CA 94104-2878  
415/772-6000  
415/772-6268(Fax)

Theodore P. Senger  
PricewaterhouseCoopers LLP  
333 Market Street  
San Francisco, CA 94104  
415/498-5000  
415/498-7135(Fax)

Dan K. Webb  
Robert Y. Sperling  
Robert L. Michels  
Winston & Strawn LLP  
35 West Wacker Drive, Suite 4200  
Chicago, IL 60601-9703  
312/558-5600  
312/558-5700(Fax)

**Counsel For Plaintiff(s)**

J. Nixon Daniel, III  
David L. McGee  
Terri L. Didier  
Beggs & Lane  
501 Commendencia Street, P.O. Box 12950  
Pensacola, FL 32591  
850/432-2451  
850/469-3330(Fax)

Scot Bernstein  
Law Office of Scot Bernstein  
10510 Superfortress Avenue, Suite C  
Mather Field, CA 95655  
916/447-0100  
916/933-5533(Fax)

CISCO (FEDERAL-LEAD)

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Page 2 of 2

Darren J. Robbins  
Spencer A. Burkholz  
Daniel S. Drosman  
Lerach Coughlin Stoia Geller Rudman &  
Robbins LLP  
401 B Street, Suite 1600  
San Diego, CA 92101-4297  
619/231-1058  
619/231-7423(Fax)

Patrick J. Coughlin  
Lesley E. Weaver  
Connie M. Cheung  
Lerach Coughlin Stoia Geller Rudman &  
Robbins LLP  
100 Pine Street, Suite 2600  
San Francisco, CA 94111-5238  
415/288-4545  
415/288-4534(Fax)

Fredric G. Levin  
J. Michael Papantonio  
Levin, Papantonio, Thomas, Mitchell, Echsner &  
Proctor, P.A.  
316 South Baylen St., Suite 600  
Pensacola, FL 32501  
850/435-7000  
850/436-6084(Fax)